



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

March 28, 2003

C. Thomas Keegel, Treasurer  
Democrat Republican Independent Voter  
Education  
35 Louisiana Avenue, N.W.  
Washington, DC 20001

Identification Number: C00032979

Reference: June Monthly Report (5/1/02-5/31/02)

Dear Mr. Keegel:

This letter is to inform you that as of March 27, 2003, the Commission has not received your response to our request for additional information, dated March 5, 2003. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by April 16, 2003. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter, please contact Antoinette Kitchen on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson

Assistant Staff Director

Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20541

RQ-2

C. Thomas Keegel, Treasurer  
Democrat Republican Independent Voter Education  
25 Louisiana Avenue, N.W.  
Washington, DC 20001

Identification Number: C00032979

MAR 05 2003

Reference: June Monthly Report (5/1/02-5/31/02)

Dear Mr. Keegel:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a receipt(s) from an organization(s) that is not registered with the Commission. 2 U.S.C. §441b prohibits the receipt of funds from national banks, corporations, and labor organizations. Under 11 CFR §102.6, however, certain entities may serve as collecting agents for the purpose of transmitting contributions to a separate segregated fund. A collecting agent may be, but is not limited to, a committee which is affiliated with the separate segregated fund; the connected organization; or a local, national, or international union.

Funds received from a collecting agent are to be attributed to the original contributors and should be disclosed according to the requirements of 11 CFR §104.3(a). If the amounts in question were contributed by individuals and transmitted to your committee by a collecting agent, the activity should be included on Line 11(a)(i) of the Detailed Summary Page. Any contribution from an individual exceeding \$200 in the aggregate during the calendar year should be itemized on a supporting Schedule A. Collecting agents need not be identified on your report.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

DEMOCRAT REPUBLICAN INDEPENDENT VOTER EDUCATION  
PAGE 2

If you have received funds from an entity which was not serving as a collecting agent, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR 103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-The totals listed on Lines 23 and 29, Column B of the Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Schedule A of your report discloses aggregate year-to-date totals for contributions received from individuals which appear to be incorrect. Please be advised that federal regulations require aggregate year-to-date totals to include only those contributions which are received during the calendar year. In the event that the aggregate year-to-date total is correct, please note that federal regulations also require the disclosure of all contributions received from individuals who have contributed over \$200. 11 CFR §104.3(a)(4) Please amend your report to provide the correct aggregate year-to-date totals.

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is

DEMOCRAT REPUBLICAN INDEPENDENT VOTER EDUCATION  
PAGE 3

defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount and frequency of the deductions.

DEMOCRAT REPUBLICAN INDEPENDENT VOTER EDUCATION  
PAGE 4

11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

-Your report disclosed certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. "Debts and obligations owed to the committee" and "operating expenditures" should be properly disclosed on a separate Schedule(s) D and B, supporting Line(s) 9 and 21(b), respectively of the Summary and Detailed Summary Pages. Please refer to the instructions for each Schedule when determining the proper categorization.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Antoinette Kitchen  
Senior Campaign Finance Analyst  
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)**  
**ITEMIZED RECEIPTS**

 Use separate schedule(s)  
 or each category of the  
 Detailed Summary Page

FOR LINE NUMBER:

PAGE 3/56

(check only one)

<input checked="" type="checkbox"/>	11a	<input type="checkbox"/>	11b	<input type="checkbox"/>	11c	<input type="checkbox"/>	12
<input type="checkbox"/>	13	<input type="checkbox"/>	14	<input type="checkbox"/>	15	<input type="checkbox"/>	17

Any information copied from such Reports and Statements may not be used or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Drive - Democrat, Republican, Independent? Voter Education - PAC for Int'l Brother-

Full Name (Last, First, Middle Initial)

A. ANDREW SULLIVAN

Mailing Address

1508 MEMORIAL DR

City

State

Zip Code

CEDAR RAPIDS

IA

52403

Date of Receipt

M	M	D	Y	Y	Y
05	03	2002			

Amount of Each Receipt this Period

40.00

FEC ID number of contributing federal political committee.

Name of Employer

LOCAL 258 SELF PAY

Occupation

Receipt For:

Primary

General

Other (specify) ▼

Aggregate Year-to-Date ▼

210.00

Transaction ID: 1465954

Full Name (Last, First, Middle Initial)

B. KIMBERLY WILSON

Mailing Address

2903 180TH STREET

City

State

Zip Code

FORT MADISON

IA

52627

Date of Receipt

M	M	D	Y	Y	Y
05	03	2002			

Amount of Each Receipt this Period

40.00

FEC ID number of contributing federal political committee.

Name of Employer

TEAMSTERS LOCAL UNION NO. 258

Occupation

Receipt For:

Primary

General

Other (specify) ▼

Aggregate Year-to-Date ▼

210.00

Transaction ID: 1465954

Full Name (Last, First, Middle Initial)

C. CITY OF NEW YORK COMPTROLLER

Mailing Address

MUNICIPAL BUILDING ONE CENTRE STREET

City

State

Zip Code

Date of Receipt

M	M	D	Y	Y	Y
05	03	2002			

Amount of Each Receipt this Period

5816.70

FEC ID number of contributing federal political committee.

Name of Employer

Occupation

Receipt For:

Primary

General

Other (specify) ▼

Aggregate Year-to-Date ▼

0.00

Transaction ID: 1477509

AK

SUBTOTAL of Receipts This Page (optional)

5896.70

TOTAL This Period (last page this line number only)

# SAMPLE

## PAYROLL DEDUCTIONS

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS		Use manual accounting for each category of the donor's summary sheet	FDP LINE NUMBER (Check only one)	Page 1 of 2
Any information copied from both Reports and Reconciliation may be used for the purpose of preparing contributions for the reporting period. Do not enter the name and address of any individual contributor to avoid confusion with the donor.			11a 11b 11c 11d 11e 11f 11g 11h 11i 11j 11k 11l 11m 11n 11o 11p 11q 11r 11s 11t 11u 11v 11w 11x 11y 11z	
NAME OF CONTRIBUTOR TO FEE				
Critical Region Inc. PAC				
Pay Name (Last, First, Middle Initial)		Payroll Deduction		
A. Name, First-Middle-Last		Date of Receipt		
Billing Address		City State Zip Code		
City		State Zip Code		
County		Amount of Each Payment for the Period		
FED ID Number of contributing federal political committee		(\$15 biweekly) <sup>2</sup>		
Name of Employer		Amount of Each Payment for the Period		
Critical Region Inc.		(\$15 biweekly) <sup>2</sup>		
Employer for:		Applicable Worksheet #		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		285.00		

## Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, type "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.9(b).

**EXAMPLE:** During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(8) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See Item A in the illustration above.)

**Adding Memo Text/Explanation:** When using FICFile electronic filing software, this information can be entered using the "memo text" window. To create a "memo text" entry, select the "View" menu on the FICFile toolbar. Select "All Transactions." Single click (highlight) the transaction to which the "memo text" will be attached. Then select the "Edit" menu on the toolbar and select "memo text."

**When using FICFile electronic filing software, enter this information in the "description" field.**

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